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COUNTY OF SACRAMENTO
(erroneously sued herein as “Sacramento County
Sheriff’s Department”)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA SACRAMENTO DIVISION

JW GEIGER,
Plaintiff,

v.

COUNTY OF SACRAMENTO,
SACRAMENTO COUNTY SHERIFF’S
DEPARTMENT and DOES 1 through 100,
inclusive,
Defendants.

Case No.: 2:22-CV-00043-JAM-DB

**STIPULATION AND ORDER
CONSOLIDATING CASES FOR ALL
PURPOSES**

YAPHETTE GEIGER; JETHRO GEIGER;
K.S., a minor, by and through their Guardian,
BRANDIE SMITH; K.G., a minor, by and
through their Guardian, BRANDI SMITH; and
N.G., a minor, by and through their Guardian,
ASIA LEE HERON,
Plaintiffs,

v.

COUNTY OF SACRAMENTO,
SACRAMENTO COUNTY SHERIFF’S
DEPARTMENT and DOES 1 through 100,
inclusive,
Defendants.

Case No.: 2:22-CV-00045-JAM-DB

Defendant County of Sacramento (“Defendant”) and Plaintiffs Yaphette Geiger; Jethro
Geiger; K.S., by and through their Guardian Brandie Smith; K.G. by and through their Guardian

1 Brandie Smith; and N.G. by and through their Guardian Asia Lee Heron, and JW Geiger
2 (“Plaintiffs”), by and through their respective counsel, hereby stipulate and agree as follows, and
3 request that this Court order as follows:

4 IT IS HEREBY AGREED AND STIPULATED THAT:

5 1. Pursuant to FRCP 42(a) the above-captioned matters involve common questions
6 of law and fact and consolidating the actions would avoid unnecessary costs, inconsistent
7 verdicts, delays, and advance the interest of judicial economy;

8 2. The above-captioned actions should be consolidated for all purposes into one
9 action and will be referenced as case number: 2:22-cv-00043-JAM-DB;

10 3. Plaintiffs to file a consolidated complaint within 45 days of the Court’s order
11 consolidating the two cases.

12 Dated: March 3, 2022

LONGYEAR & LAVRA, LLP

14 By: /s/ Nicole M. Cahill

15 VAN LONGYEAR
16 NICOLE M. CAHILL
17 Attorneys for Defendant,
COUNTY OF SACRAMENTO

18 Dated: March 3, 2022

MOSLEY & ASSOCIATES

19 By: /s/ Nathalie Meza Contreras [as authorized 3-1-22]

20 Walter Mosley, Esq.
21 Carlos E. Montoya, Esq.
22 Nathalie Meza Contreras, Esq.
23 Attorneys for Plaintiffs
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ORDER

The above stipulation having been considered and good cause appearing therefore, **IT IS SO ORDERED.**

DATED: March 7, 2022

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE